

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, FEDERAL HIGHWAY  
ADMINISTRATION, SHAILEN BHATT, in  
his official capacity as Administrator of the  
Federal Highway Administration, and  
RICHARD J. MARQUIS, in his official  
capacity as Division Administrator of the New  
York Division of the Federal Highway  
Administration,

Defendants.

Hon. Brian R. Martinotti

Civ. No. 2:23-cv-03885-BRM-LDW

**APPLICATION FOR ADMISSION *PRO  
HAC VICE* OF JOHN F. NELSON  
PURSUANT TO D.N.J. L.CIV.R. 101**

Proposed Intervenor-Defendants the Metropolitan Transportation Authority (the “MTA”) and the Triborough Bridge and Tunnel Authority (“TBTA”), by their undersigned counsel, hereby move this Court for an entry of an Order allowing the admission *pro hac vice* of:

John F. Nelson, Esq.  
Sive, Paget & Riesel, P.C.  
560 Lexington Avenue, 15th Floor  
New York, NY 10022

**PLEASE TAKE FURTHER NOTICE** that the undersigned certifies as follows:

1. I will comply with Local Civil Rule 101.1(c) and will be held responsible for the conduct of John F. Nelson, Esq.
2. I will ensure that John F. Nelson, Esq. complies with Local Civil Rule 101.1(c).

3. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will sign all pleadings, briefs and other papers filed with the Court.

4. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will make all Court appearances required by the Court and the Local Rules.

**PLEASE TAKE FURTHER NOTICE** that the MTA and TBTA will rely upon the accompanying declaration of John F. Nelson, Esq. in support of this motion and that no brief is necessary as this motion raises no issue of law and the relief sought is within the Court's discretion.

Respectfully submitted this 6th day of October 2023.

/s/ Daniel Chorost  
Daniel Chorost  
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*Counsel for Proposed Intervenor-  
Defendants the Metropolitan  
Transportation Authority and the  
Triborough Bridge and Tunnel Authority*